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To: <lclyde@waterboards.ca.gov>, Elaine Wellin <ewellin@aol.com>, Jack Silve...
Date: 8/7/2005 9:41 AM
Subject: Incidental Runoff

Dear WCQB,

I understand that you are considering new language for permits that would allow "incidental runoff". Forest Unlimited is opposed to such language or such a policy for the following reasons:

1. The cumulative effects of many small runoff may lead to significant pollution in the Russian River.
2. It would constitute "backsliding" on water quality.
3. It would eliminate any incentive for the Sonoma County Water Agency to prevent it's repeated violations.
4. It would lead to further eutrication of the Laguna de Santa Rosa which is responsible for the infestation by *Ludwigia* which provides shelter for mosquito, a vector for West Nile virus.
5. It would make enforcement of water quality standards more difficult.
6. Treated sewage still contains wetting agents from detergents like nonyl phenol. Nonyl phenol has been shown to disrupt the salmonid breeding cycle in very small concentrations because it mimics salmonid hormones. Salmon are a key element in north coast forest ecology because they transport ocean-gathered nutrients inland where salmon predators can distribute them to the forest.

Rather than permitting additional dumping in the river, WQCB should eliminate discharge ANY time of the year! Further, WQCB should stop pretending that the "receiving waters" of Santa Rosa's effluent is the Russian River and not the Laguna.

Sincerely,

Rick Coates
Executive Director
Forest Unlimited